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Attorneys for Plaintiffs
CARMEL GARCIA, M.Y. AND L.Y., minors
by and through their guardian ad litem
VANESSA RUIZ; L.Y., a minor by and
through his guardian ad litem FRANCISCA
URIOSTEGUI

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

CARMEL GARCIA, an individual; M.Y. AND
L.Y., minors by and through their guardian ad
litem VANESSA RUIZ; L.Y., a minor by and
through his guardian ad litem FRANCISCA
URIOSTEGUI,

Plaintiff,

v.

YUBA COUNTY SHERIFF'S
DEPARTMENT; YUBA COUNTY
SHERIFF'S DEPUTIES DOES 1-5; CITY OF
VACAVILLE; and VACAVILLE POLICE
OFFICER DOES 6-10;

Defendants.

No. 2:19-cv-2621 KJM DB

**SIXTH STIPULATED REQUEST TO CONTINUE
PRE-TRIAL DEADLINES; AND ORDER**

1 WHEREAS, Plaintiffs CARMEL GARCIA, M.Y. AND L.Y., minors by and through their
2 guardian ad litem VANESSA RUIZ; L.Y., a minor by and through his guardian ad litem FRANCISCA
3 URIOSTEGUI, (“Plaintiffs”) initiated this case on March 11, 2020 (Dkt. No. 1.1);

4 WHEREAS, Plaintiffs named the CITY OF VACAVILLE, JULIE BAILEY, CHUCK BAILEY,
5 DUSTIN WILLIS, and DAVE SPENCER as Defendants (collectively, “Defendants”);

6 WHEREAS, on May 31, 2022, the Parties filed a fifth stipulation to continue pre-trial deadlines
7 (Dkt. No. 62) because there were discovery delays, including in taking Plaintiff’s M.Y. and L.Y.’s
8 depositions due to Plaintiff’s Counsel being called to trial in Los Angeles Superior Court, Case Number
9 BC663663.

10 WHEREAS, on June 6, 2022, the Court issued an order granting the Parties’ stipulated request to
11 continue pretrial deadlines. (Dkt. No. 63);

12 WHEREAS, the Court’s amended scheduling order set the non-expert discovery deadline for
13 July 25, 2022;

14 WHEREAS, the Parties have worked diligently to complete discovery by the deadline of July 25,
15 2022;

16 WHEREAS, the Parties are working together to schedule depositions, but several depositions
17 have yet to be taken.

18 WHEREAS, due to Plaintiffs’ counsel trial assignment and unavailability, the Parties will be
19 unable to complete the remaining depositions before the July 25, 2022, deadline;

20 WHEREAS, this stipulation is not made for any improper purpose and will not prejudice any
21 party; and

22 WHEREAS, the requested modifications will not otherwise impact the trial date for the case as
23 none has been set.

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STIPULATION

NOW, THEREFORE, Plaintiffs and Defendants stipulate and request the court continue presently set pre-trial dates as follows:

Event	Current Deadline	Proposed Deadline
Discovery Cutoff	July 25, 2022	August 26, 2022
All Dispositive Motions Hearing Date	October 21, 2022	No change
Expert Disclosures	October 31, 2022	No change
Supplemental Experts	November 14, 2022	No change
Completion of Expert Discovery	December 12, 2022	No change

Dated: July 21, 2022

BERTRAND, FOX, ELLIOT, OSMAN & WENZEL

By: /s/ Richard W. Osman
 Richard W. Osman
 Sheila D. Crawford
 Attorney for Defendants
 CITY OF VACAVILLE, JULIE BAILEY,
 CHUCK BAILEY, DUSTIN WILLIS, and DAVE
 SPENCER

Dated: July 21, 2022

LAW OFFICES OF STANLEY GOFF

By: /s/ Stanley Goff
 Stanley Goff
 Attorney for Plaintiffs
 CARMEL GARCIA, M.Y. AND L.Y., minors by and
 through their guardian ad litem VANESSA RUIZ;
 L.Y., a minor by and through his guardian ad litem
 FRANCISCA URIOSTEGUI

ELECTRONIC CASE FILING ATTESTATION

I, Richard W. Osman, hereby attest that I have on file all holograph signatures for any signatures indicated by a conformed signature (“/s/”) within this E-filed document or have been authorized by counsel to show their signature on this document as /s/.

Dated: July 21, 2022

By: /s/ Richard W. Osman
 Richard W. Osman

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED:

The pre-trial deadlines are continued as follows:

Event	Current Deadline	Proposed Deadline
Discovery Cutoff	July 25, 2022	August 26, 2022
All Dispositive Motions Hearing Date	October 21, 2022	No change
Expert Disclosures	October 31, 2022	No change
Supplemental Experts	November 14, 2022	No change
Completion of Expert Discovery	December 12, 2022	No change

DATED: August 15, 2022

/s/ DEBORAH BARNES
UNITED STATES MAGISTRATE JUDGE